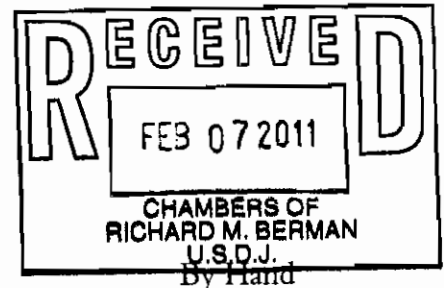


STROOCK

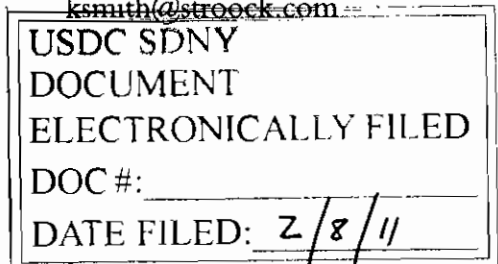


February 4, 2011

MEMO ENDORSED
pg 2

Kevin L. Smith
Direct Dial 212-806-5594
Direct Fax 212-806-2594
ksmith@stroock.com

Hon. Richard M. Berman
United States District Judge
United States District Court
40 Centre Street, Courtroom 706
New York, New York 10007



Re: Westport Ins. Corp. v. The Hamilton Wharton Group, et al.,
Case No. 10 CV 2188 (RMB) (THK) (the "Action")

Dear Judge Berman:

We represent defendants, The Hamilton Wharton Group, Inc. ("Hamilton Wharton") and Walter B. Taylor, individually ("Taylor") (together "Defendants") in the Action.

Pursuant to Your Honor's Administrative Order, dated and entered February 1, 2011, Defendants agree to be bound by the pending motion for summary judgment, dated October 29, 2010 (Docket Entry No. 59).

Counsel for each of the co-defendants who have appeared to date have also agreed to be bound. For the Court's convenience, copies of their correspondence are attached.

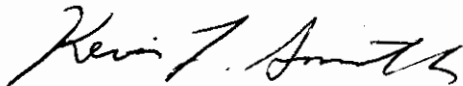
Twenty-two new co-defendants are named in the First Amended Complaint recently filed by the Plaintiff. We understand that these co-defendants will be collectively represented by the firm of Gross Shuman Brizdle & Gilfillan, P.C., and that their incoming counsel, Richard Scott Atwater, Esq., is attempting at this time to file his notice of appearance.

Mr. Atwater advised the Court, by letter dated February 3, 2011 (copy attached), that he is in the process of conferring with his clients to obtain their consent to be bound by the pending motion for summary judgment. We spoke with Mr. Atwater today and he authorized us to advise the Court that twelve of his clients have already agreed to be bound and that he is in the process of attempting to contact the remaining ten to confirm their agreement as well.

Hon. Richard M. Berman
February 4, 2011
Page 2

As we understand from Mr. Atwater that he is recommending that his clients consent but requires additional time to reach all of them, we would respectfully request that the Court extend the deadline for consent set forth in the Court's February 1, 2011 Order by a reasonable period.


Respectfully submitted,



Kevin L. Smith

Attachments

cc: All Counsel of Record and incoming counsel (by e-mail)

Defendants' time to	
respond is extended to	
2/11/11.	
SO ORDERED:	
Date: 2/7/11	
Richard M. Berman, U.S.D.J.	